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October 18, 2007

**BY CM/ECF AND HAND DELIVERY**

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
District of Delaware  
844 King Street  
Wilmington, DE 19801

Re: • *Magten Asset Management Corp. and Law Debenture Trust Co. v. Northwestern Corp.*; C.A. No. 04-1494-JJF  
• *Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt*; C.A. No. 05-0499-JJF

Your Honor:

The parties in the above-captioned matters jointly request that the Court permit a slight revision to the Scheduling Order in this case, as set forth in the enclosed Second Stipulation and (Proposed) Order to Amend Rule 16 Scheduling Order.

The parties are requesting that the date for filing dispositive motions be extended from November 21, 2007 to November 30, 2007, to permit the parties to focus their energies on a second round of mediation scheduled for November 15, 2007 before the Third Circuit Mediator. It is expected that this mediation will explore a global settlement. The parties are also currently requesting that they be permitted to brief the case dispositive motions in accordance with an agreed upon schedule – that accommodates the Holiday season – in lieu of the briefing schedule contained in Local Rule 7.1.2. The parties do not seek any modification to the Pretrial Conference and Trial dates previously set by the Court.

Counsel is available by telephone, should Your Honor have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dale Dubé".

Dale R. Dubé  
I.D. No. 2863



The Honorable Joseph J. Farnan, Jr.  
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DRD/pb  
Enclosure

cc: Clerk of Court (via hand delivery)  
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